

From: [Gloria-Small Moran](#)
To: [Gary Moore](#)
Cc: [Susan Webster](#)
Subject: Re: Fw: Give me your thoughts _REPLY
Date: 02/14/2011 09:10 AM

Thanks for your response. It is an important factor in determining our next steps.

Gloria Moran
Assistant Regional Counsel
Superfund Branch (6RC-S)
U.S.EPA, Region 6
1445 Ross Avenue
Dallas TX 75202-2733
214-665-3193
214-665-6460 (fax)
moran.gloria-small@epamail.epa.gov

▼ Gary Moore---02/11/2011 09:34:03 PM---Gloria: On the removal, I would rather they, NORCO, complete the work as long as they can complete t

From: Gary Moore/R6/USEPA/US
To: Gloria-Small Moran/R6/USEPA/US@EPA
Cc: Susan Webster/R6/USEPA/US@EPA
Date: 02/11/2011 09:34 PM
Subject: Re: Fw: Give me your thoughts

Gloria:

On the removal, I would rather they, NORCO, complete the work as long as they can complete the removal of all materials from the tanks before June 1, 2011 or soon thereafter. Stephen knows the site, the waste stream, and has already determined what needs to happen. Timeliness is my issue. They have only two things to complete for me and they are removal of all abandoned materials from all containers, piping, etc. on site (including decontamination) and removal of all grossly/visibly contaminated soils. My preference is to not bring in a bunch of new contactors (START/ERRS) and basically start from scratch.

Thanks

Gary Moore
Federal On-Scene Coordinator
EPA Region 6
Cell: 214-789-1627
Work: 214-665-6609
email: moore.gary@epa.gov



9567530

▼ Gloria-Small Moran---02/11/2011 05:08:51 PM---Talk to your managers and let me know. Gloria Moran

From: Gloria-Small Moran/R6/USEPA/US
To: Robert Werner/R6/USEPA/US@EPA, Gary Moore/R6/USEPA/US@EPA, Rafael Casanova/R6/USEPA/US@EPA
Date: 02/11/2011 05:08 PM
Subject: Fw: Give me your thoughts

Talk to your managers and let me know.

Gloria Moran
Assistant Regional Counsel
Superfund Branch (6RC-S)
U.S.EPA, Region 6
1445 Ross Avenue
Dallas TX 75202-2733
214-665-3193
214-665-6460 (fax)
moran.gloria-small@epamail.epa.gov

----- Forwarded by Gloria-Small Moran/R6/USEPA/US on 02/11/2011 05:05 PM -----

From: Gloria-Small Moran/R6/USEPA/US
To: "Richard Bergner" <rbergner@rflaw.net>
Cc: "Halasz, Stephen \"(Austin,TX-US)\" <SHalasz@trcsolutions.com>, Robert Werner/R6/USEPA/US@EPA, Rafael Casanova/R6/USEPA/US@EPA, Gary Moore/R6/USEPA/US@EPA
Date: 02/11/2011 04:53 PM
Subject: Re:

Richard:

By your email of yesterday, 2/10/11, the Region is advised that NORCO is prepared to immediately resume work under the two AOCs. Prior to the commencement of work, however, the Region must receive written information concerning the buyer - name, address, contact information, intended use by the buyer of the property, schedule of activities toward the closing, etc.

In addition, the EPA has determined that NORCO is in violation of both AOCs. By the letter from you dated February 16, 2010, EPA was informed that NORCO was not financially able to perform the work under the AOCs. The Region will prepare a schedule of penalties plus interest, that must be paid before work can be resumed. It is possible that EPA can work with NORCO concerning an arrangement for these penalty payments. In addition, replenishment of the special accounts must be completed as a prior matter. Finally, because Mr. Halasz is with a new company, TRC Companies, this company must qualify as a Project Coordinator in order to perform the work required by the

AOCs. Rafael Casanova and Gary Moore are responsible for assessing the qualifications of a company that is selected to perform work under the oversight of EPA.

I will send you a formal letter within the week concerning the details of this email. .

Thank you,

Gloria Moran
Assistant Regional Counsel
Superfund Branch (6RC-S)
U.S.EPA, Region 6
1445 Ross Avenue
Dallas TX 75202-2733
214-665-3193
214-665-6460 (fax)
moran.gloria-small@epamail.epa.gov

▼ "Richard Bergner" ---02/10/2011 02:17:28 PM---Ms. Moran:

From: "Richard Bergner" <rbergner@rflaw.net>
To: Gloria-Small Moran/R6/USEPA/US@EPA
Cc: "Halasz, Stephen \"(Austin,TX-US)\" <SHalasz@trcsolutions.com>
Date: 02/10/2011 02:17 PM
Subject:

Ms. Moran:

I am pleased to advise that National Oil Recovery Corporation ("Norco"), in connection with a Facility Purchase Agreement, dated effective 2/4/11, and scheduled for a March 15, 2011, closing, has made arrangements to immediately restart operations under its two AOC's.

Stephen Halasz, now with TRC Companies, Inc., 505 E. Huntland Drive, Suite 250, Austin, Texas 78752, will continue as Norco's Project Coordinator.

By copy of this e-mail to Mr. Halasz, I am requesting him to make contact with the EPA's On-Scene Coordinator for the Removal AOC and the Remedial Project Manager for the RI/FS AOC to discuss and implement this restart.

Thank you for your patience, which has helped Norco to attend to completion of the

work contemplated under the two AOC's.

Richard F. Bergner